

Exhibit “C”

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE**

BRANDY HUDSON

Plaintiff,

Civil Action No.
1:11-cv-01384-JDB-egb

v.

LAW OFFICE OF L. RYAN COPELAND, P.C.,
LINDSAY RYAN COPELAND AND JOHN DOE(S)

Defendants.

AFFIDAVIT OF CRAIG J. EHRLICH

The Affiant, being duly sworn and upon oath, hereby states the following:

1. I am competent to testify in a court of law and if called to do so would testify as specified herein.
2. I am one of Plaintiff's attorneys in this matter and was retained to represent Plaintiff in a Federal Fair Debt Collections Practices Act ("FDCPA") claim against Defendants.
3. My office, in an effort to minimize costs, first tried to resolve this matter with Defendants, Law Office of L. Ryan Copeland, P.C. and Lindsay Ryan Copeland, through an informal letter. After this method proved unsuccessful, my office filed suit against Defendants. Despite being served Defendants have not answered the Complaint.

4. Pursuant to the FDCPA, Plaintiff is entitled to statutory damages of up to one thousand dollars, attorney fees and court costs if Plaintiff prevails.
5. Defendants' failure to answer the instant complaint constitutes an acquiescence to the merits of the Complaint and that Plaintiff has prevailed herein.
6. The total amount of the sum-certain judgment sought herein the amount of four thousand seven hundred nine dollars and eighty-five cents (\$4,709.85), representing statutory damages in the amount of one thousand dollars (\$1,000.00), 15 U.S.C. §1692(k)(a)(2)(A). Plaintiff has incurred more than \$4,100.00 in attorney's fees to date. Excising billing discretion Plaintiff seeks three thousand dollars (\$3,000.00) in attorney fees and seven hundred nine dollars and eighty-five cents (\$709.85) for court costs.

FURTHER AFFIANT SAYETH NAUGHT.

**By: s/ Craig J. Ehrlich
Craig J. Ehrlich**